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*Attorneys for Defendant Google LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF VIOLA TREBICKA  
IN SUPPORT OF GOOGLE'S  
ADMINISTRATIVE MOTION TO SEAL  
JOINT CASE MANAGEMENT  
STATEMENT**

Referral: Hon. Susan van Keulen, USMJ

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make  
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I  
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google’s  
7 Administrative Motion to Seal portions of the parties’ Joint Case Management Statement. In making  
8 this request, Google has carefully considered the relevant legal standard and policy considerations  
9 outlined in Civil Local Rule 79-5. Google makes this request with the good faith belief that the  
10 information sought to be sealed consists of Google’s confidential and proprietary information and  
11 that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the Joint  
13 Case Management Statement, attached hereto as Exhibit A.

14 4. The information requested to be sealed contains Google’s highly confidential and  
15 proprietary information regarding highly sensitive features of Google’s internal systems and  
16 operations, including details related to the cookies and identifiers Google uses internally and their  
17 proprietary functions, that Google maintains as confidential in the ordinary course of its business  
18 and is not generally known to the public or Google’s competitors.

19 5. Such confidential and proprietary information reveals Google’s internal strategies,  
20 system designs, and business practices for operating and maintaining many of its important services,  
21 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-  
22 3.

23 6. Public disclosure of such confidential and proprietary information could affect  
24 Google’s competitive standing as competitors may alter their identifier and cookie system designs  
25 and practices relating to competing products. It may also place Google at an increased risk of cyber  
26 security threats, as third parties may seek to use the information to compromise Google’s identifier  
27 system.

1           7.       For these reasons, Google respectfully requests that the Court order the Joint Case  
2 Management Statement to be filed under seal.

3           I declare under penalty of perjury of the laws of the United States that the foregoing is true  
4 and correct. Executed in Los Angeles, California on May 19, 2021.

5  
6 DATED: May 19, 2021

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

7  
8  
9 By 

Viola Trebicka

*Attorney for Defendant*